

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in compliance with D.N.J. LBR 9004-1(b)	
HILL WALLACK LLP Elizabeth K. Holdren, Esq. 21 Roszel Road P.O. Box 5226 Princeton, NJ 08543 Phone: 609-924-0808 eholdren@hillwallack.com <i>Attorneys for NewRez, LLC d/b/a Shellpoint Mortgage Servicing</i>	
In Re: Chris R Weber Danielle L. Ruediger-Weber Debtor.	Case No.: 18-33814-JNP Chapter: 13 Hearing Date: July 30, 2019 Judge: Jerrold N. Poslusny Jr., U.S.B.J.

**NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

To: **Jeanne A. Naughton, Clerk**
U.S. Post Office and Courthouse
401 Market Street
Courtroom 4C
Camden, NJ 08101

Isabel Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38 – Suite 580
Cherry Hill, New Jersey 08081
Trustee

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Ste 502
Philadelphia, PA 19107
Debtor's Attorney

Chris R Weber
423 Silver Hill Road
Cherry Hill, NJ 08002
Debtor

Danielle L. Ruediger-Weber
423 Silver Hill Road
Cherry Hill, NJ 08002
Joint Debtor

Sally R. Weber
423 Silver Hill Road
Cherry Hill, NJ 08002
Co-Debtor

Lawrence G. Weber
423 Silver Hill Road
Cherry Hill, NJ 08002
Co-Debtor

PLEASE TAKE NOTICE, that on July 30, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, Hill Wallack LLP, attorneys for NewRez, LLC d/b/a Shellpoint Mortgage Servicing (“Movant”), shall move before the Honorable Jerrold N. Poslusny Jr. at the U.S. Post Office and Courthouse, 401 Market Street, Courtroom 4C, Camden, New Jersey 08101, for an Order granting Movant relief from the automatic stay with respect to the debtors, **Chris R Weber** and **Danielle L. Ruediger-Weber** (“Debtors”) pursuant to Section 362(d)(1) of the Bankruptcy Code, and relief from the co-debtor stay with respect to, ***Sally R. Weber and Lawrence G. Weber*** (“Co-Debtors”) pursuant to Section 1301(c) of the Bankruptcy Code, with respect to real property located at 423 Silver Hill Rd, Cherry Hill New Jersey 08002 (the “Property”), on which Movant holds a first Mortgage; and

PLEASE TAKE FURTHER NOTICE that Movant shall rely upon the accompanying in support of its Motion; and

PLEASE TAKE FURTHER NOTICE, that Movant further requests an order providing that all communications sent by Secured Creditor in connection with proceeding against the property including, but not limited to, notices required by state law and communications to offer and provide information with regard to a potential Forbearance Agreement, Loan Modification,

Refinance Agreement, Loss Mitigation Agreement, or other Loan Workout, may be sent directly to Debtor; and

PLEASE TAKE FURTHER NOTICE, that in accordance with LBR 9013-1(a) and LBR 9013-4, a proposed form of Order is submitted herewith and no brief is necessary as there is no material issue of law in dispute and in accordance with LBR 9013-3(d), this motion will be decided on the papers unless opposition is filed.

HILL WALLACK LLP
*Attorneys for NewRez, LLC d/b/a Shellpoint
Mortgage Servicing*

By: /s/ Elizabeth K. Holdren
Elizabeth K. Holdren

Dated: July 3, 2019